

POLICY AND TRAINING ASSESSMENT CRITERIA

In this section, the policy and training assessment criteria are split into four parts: 1) statutory policies related to school safety and security; 2) criteria-based policies relating to school safety and security; 3) statutory training; and 4) criteria-based training. Together, these components are designed to be used by assessors to ensure both that schools and school entities are compliant with relevant statutory requirements relating to safety and security policies, and that they have relevant criteria-related policies in place regarding the physical safety, behavioral health and school climate criteria identified in this guide.

Note: The term "policy/procedure" in these criteria is used as a general term denoting written documentation and could include a board-approved policy, internal procedure or administrative regulation, or plan, based on requirements of law and regulations and the advice of legal counsel.

Section 1303-B of [Act 44](#), amending the [Pennsylvania Public School Code of 1949](#) (PA School Code), requires that the policy and training assessment consist of an evaluation of the school entity's policies/procedures and practices and requires discussions with the school entity's employees in order to conduct the assessment. A school safety assessor is required to review and analyze policies/procedures and make recommendations for effective school safety and security training and practices for all school entity employees (see [Section 1303-B](#) (a)(2) of the PA School Code).

STATUTORY POLICIES RELATING TO SCHOOL SAFETY AND SECURITY

There are several policies/procedures and written guidelines that are mandated by law. **School entities should be prepared to provide documentation of compliance with all mandated policies and procedures to assessors.** At a minimum, each of the following statutory policies/procedures should be reviewed by the assessor and evaluated:

All-Hazards/Emergency Preparedness Plan		
✓	Tier	Statement
	T1	1. The school entity has a policy/procedure guiding the development, implementation and annual review of a comprehensive All-Hazards or Emergency Preparedness Plan as required by 35 Pa. C.S.A. §7701 .
	T1	2. The school entity should have a policy/procedure regarding their relationships with law enforcement agencies.
	T1	3. The school entity policy/procedure requires assembly of information annually to assist local police and fire departments in responding to an emergency, which shall be deployed immediately to the Incident Command Post in the event of an emergency incident or disaster, as required by 22 PA Code 10.24 .
Behavior Support Policy		
	T1	1. The school entity has a policy/procedure addressing positive behavior support of students with disabilities, which includes sharing of procedures and information in handling students with disabilities with law enforcement agencies, in accordance with applicable law. (22 PA Code 10.23 , 14.133).
	T1	a. The policy/procedure directs that copies of behavior support protocols be shared with local law enforcement agencies.

Policy and Training Assessment Criteria

✓	Tier	Statement
	T2	b. The policy/procedure directs the school entity to invite representatives of each local police department to participate in training on the use of positive behavior supports, de-escalation techniques and appropriate responses to student behavior.
Bullying Policy		
	T1	1. The school entity has a policy/procedure relating to bullying incorporated into their student code of conduct (Section 1303.1-A of the PA School Code).
	T1	a. The policy/procedure is comprehensive, addressing both physical and virtual bullying.
	T1	b. The policy/procedure identifies the employee(s) who is/are to receive bullying reports.
	T1	c. The policy/procedure includes reporting procedures that are reviewed annually with students.
	T1	d. The policy/procedure delineates disciplinary consequences for bullying.
	T2	e. The policy/procedure provides for prevention, intervention and education programs.
	T1	f. The policy/procedure is available on the school entity's website and accessible in every classroom. <i>NOTE: The policy/procedure must only be available, not necessarily displayed.</i>
	T1	g. The bullying policy/procedure is publicly posted at a prominent location within the school building where such notices are usually posted.
	T1	h. The policy/procedure has been reviewed within the past three years.
Hazing Policy (Mandated for secondary schools only)		
	T1	1. The school entity has a policy/procedure prohibiting hazing in connection with any student activity or organization (18 Pa. C.S.A. 2808).
	T1	a. The policy/procedure addresses reporting, investigation, and consequences for hazing incidents.
	T1	b. Students, employees, and parents/guardians are notified regarding the policy/procedure.
Safe2 Say Something		
	T1	1. The school entity must have procedures in place for assessing and responding to reports received from the Safe2Say Something program (Section 1303-D (d) of the PA School Code).
	T2	a. Each school entity has an established Safe2Say Something team.
Suicide Awareness and Prevention Policy		
	T1	1. The school entity has a youth suicide awareness and prevention policy/procedure, as required by Act 71 of 2014 (24 P.S. §15-1526) .
	T1	a. The policy/procedure includes protocols for administering youth suicide awareness and prevention education to employees and students.
	T1	b. School entity employees and the parents/guardians of all enrolled students have been informed of this policy/procedure.
	T1	c. The policy/procedure is publicly posted on the school entity's website.

Policy and Training Assessment Criteria

✓	Tier	Statement
	T2	d. The school entity has designated a suicide prevention coordinator(s), crisis response/intervention team, and/or methods for prevention, intervention and response.
Student Services		
	T1	1. The school entity has a written plan for the implementation of a comprehensive and integrated K-12 program of student services based on the needs of its students (see 22 Pa. Code § 12.41).
	T1	2. The plan includes the following categories of services:
	T1	a. Developmental services addressing students’ developmental needs throughout their enrollment, including guidance counseling, psychological services, health services, home and school visitor services, and social work services.
	T1	b. Diagnostic services to identify barriers and intervention and referral services to mitigate barriers for students who are experiencing problems attaining educational achievement appropriate to their learning potential.
	T1	c. Consultation and coordination services for students who are experiencing chronic problems that require multiple services by teams or specialists.
	T1	3. If a school district, the school entity provides a Student Assistance Program (SAP) in accordance with Section 1547(g) of the PA School Code (see Secretary's Plan to the General Assembly).
Threat Assessment		
	T1	1. In accordance with Section 1302-E (this section shall apply beginning in the 2021-2022 school year) of the PA School Code, the school entity has policies/procedures defining the scope and operations of the threat assessment process, including:
	T1	a. The membership of the threat assessment team and team training requirements.
	T1	b. The scope of activities the team is directed to engage in based on statutory requirements in.
	T1	c. Guidelines on communication with employees, students and parents/guardians regarding reporting of threats and response to individual incidents.
Weapons Policy		
	T1	1. In accordance with Section 1317.2(b) of the PA School Code, the school entity has a written policy/procedure regarding possession of a weapon by students.
	T1	a. School entity employees and the parents/guardians of all enrolled students have been informed of this policy/procedure.
	T2	b. The policy/procedure is publicly posted on the school entity’s website.

CRITERIA-BASED POLICIES RELATING TO SCHOOL SAFETY AND SECURITY

The following policies/procedures correspond to the [\(include link to Physical Assessment Criteria\)](#) as included in this Toolkit. School entities following the best practices recommended for the physical assessment criteria should adopt written policies/procedures to document actions that correspond with that criteria (e.g., if a school entity decides to install a panic button, the entity should have a corresponding written policy/procedure directing the training of any employee who may use the panic button, how it should be used, and the responders summoned upon it's activation).

CRITERIA-BASED POLICIES/PROCEDURES RELATING TO EXTERIOR SECURITY OF A SCHOOL BUILDING

Based on the criteria relating to the exterior security of a school building (i.e., where schools already have in existence or have made corresponding physical security changes), it is best practice to have the following written policies/procedures in place:

Exterior Building		
✓	Tier	Statement
	T1	1. The school entity should have a policy/procedure regarding development of a maintenance schedule to ensure security and a process for reporting lighting or other security-related deficiencies.
	T1	2. The school entity should have a policy/procedure prohibiting door propping.
	T1	3. The school entity should have a policy/procedure designating specified entrances for school visitors.
	T1	4. The school entity should have a policy/procedure and related steps requiring employee action in the event of potentially unauthorized visitors, such as someone entering a building without authorization or through an unsecure door or being seen in the building without appropriate identification.
Vehicle Access		
	T1	1. The school entity should have policies/procedures guiding vehicular access to school property, including:
	T1	a. Emergency vehicle access.
	T1	b. Student bus and personal vehicle drop-off and pick-up areas.
	T1	c. Bus and personal vehicle idling.
	T1	d. Parking areas for employees, students and visitors.
	T1	e. A parking permit system for employee and student vehicles.
	T1	f. Student access to private vehicles during the school day.
	T1	g. Provisions for searching student vehicles when necessary, in accordance with law and regulations.
	T1	h. Clear and appropriate signage.
	T1	i. Use and placement of devices such as bollards or vehicle barriers to provide safety for pedestrians and building entrance points.

Policy and Training Assessment Criteria

Deliveries		
✓	Tier	Statement
	T1	1. The school entity should have policies/procedures guiding external deliveries to school buildings, including:
	T1	a. Location of and access to designated delivery areas to ensure that there is no unauthorized entry.
	T1	b. Inspection and approval of delivered items.
	T1	c. Protocol for dealing with suspicious and/or unauthorized deliveries.
	T1	d. Monitoring of delivery personnel.
After Hours and Large Gatherings		
	T1	1. The school entity has policies/procedures guiding security and access to school property during events or activities occurring after school hours (games, concerts, etc.), including ensuring the presence and protocol of school security personnel.

CRITERIA-BASED POLICIES/PROCEDURES RELATING TO INTERIOR SECURITY OF A SCHOOL BUILDING

Based on the criteria relating to the interior security of a school building (i.e., where schools already have in existence or have made corresponding physical security changes), it is best practice to have the following written policies/procedures in place:

Interior Building		
✓	Tier	Statement
	T1	1. School entity has policies/procedures regarding the parameters for students carrying bags throughout the school building during the school day.
	T1	2. School entity has provisions for searching student possessions when necessary, in accordance with law and regulations.
	T2	3. School entity has policies/procedures regarding regularly training employees on how to utilize remote locking systems.
	T2	4. School entity has protocols for employees on when and how to use a panic button, including who to contact or notify when it is used.
	T1	5. School entity has key control/digital access policies/procedures, including:
	T1	a. Personnel authorized for access to individual keys.
	T1	b. Scheduled inventory of all keys.
	T1	c. Record maintenance of the number of keys/cards/fobs in circulation and to whom they are assigned.
	T1	d. Key possession and return.
	T1	e. Lost or stolen key reporting.
	T1	f. Requirement to re-key locks of stolen or lost keys.
	T1	g. Security of master keys and master key access.
	T2	h. Five-year interval of exterior door re-keying.
	T1	i. Key access for local first responders.

Policy and Training Assessment Criteria

✓	Tier	Statement
	T2	6. School entity has a policy/procedure guiding record keeping regarding school identification, including:
	T2	a. Intervals at which identification system should be updated.
	T2	b. Length of time student identification information is kept for security purposes beyond graduation or departure from school (e.g. student moved, changed school, dropped out, etc.).
	T2	c. Length of time employee identification information is kept for security purposes beyond separation.
	T1	7. School entity has a visitor policy/procedure (signing in, visible identification, etc.) that stresses its application to ALL visitors, including personal visitors of employees.
	T1	a. The visitor policy/procedure includes routine general awareness education for students and employees on visitor procedures.
	T3	b. The visitor policy/procedure addresses use of ID scanning software, training and maintenance of records.
	T1	8. School entity has a policy/procedure requiring that all interior doors, including classroom doors, are kept closed, latched, and locked at all times.
	T1	9. School entity has a policy/procedure requiring that office employees always be notified if a teacher is holding an outside activity on the grounds.
Surveillance and Technology		
	T1	1. The school entity has policies/procedures guiding the use, location and monitoring, as well as the accessibility and storage of information/data, of surveillance equipment, such as cameras, on school property and school transportation vehicles.
	T2	a. The policy/procedure requires that electronic records (such as recordings from video cameras) be maintained for a minimum of 15 days.
	T1	b. Policy/procedures developed in consultation with local first responders address their access to cameras/keys during emergency situations.
	T1	2. The school entity has policies/procedures addressing the security of technology (computers, servers, etc.), including access, maintenance, and back-up and disaster recovery procedures.
Communication		
	T1	1. The school entity has policies/procedures guiding communication, including:
	T1	a. Within and between buildings, portable/mobile classrooms, and outdoor areas (playgrounds, athletic areas, parking lots, etc.).
	T1	b. Between the school and teachers, especially when off school grounds.
	T1	c. Drill and emergency/crisis communication protocols for employees and with parents/guardians and the public.
	T1	d. A reunification plan for students and families following an emergency drill or crisis situation.

CRITERIA-BASED POLICIES/PROCEDURES RELATING TO BEHAVIORAL HEALTH AND SCHOOL CLIMATE

Based on the criteria relating to behavioral health, it is best practice to have the following written policies/procedures in place:

Behavioral Health and School Climate		
✓	Tier	Statement
	T1	1. The school entity has policies/procedures regarding drug, alcohol and tobacco/vaping use.
	T1	2. The school entity has policies/procedures addressing behavioral health concerns, including, for school districts, a guidance counseling program and Student Assistance Program.
	T1	3. The school entity has policies/procedures on how to respond in the aftermath of a traumatic event, including communication and the presence of a crisis response team.
	T2	4. The school entity has a policy/procedure and a plan in place for trauma-informed approaches to education.
	T3	5. The school entity has policies/procedures related to school climate, including the administration and use of school climate surveys.

OTHER CRITERIA-BASED POLICIES/PROCEDURES REQUIRING REVIEW

School entities should have the following written policies/procedures in place:

General		
✓	Tier	Statement
	T1	1. The school entity should have policies/procedures regarding transportation and bussing, including:
	T1	a. Communication guidance and accident protocols.
	T1	b. Planning and execution of required fire, emergency evacuation and school security drills. (24 P.S. § 15-1517).
	T1	c. Communication, protocol and training for bus drivers regarding observing students and surroundings, including reporting visual cues of concern and all incidents, such as health or safety issues, discipline problems, incidents of violence, bullying or harassment, and violations of Pennsylvania’s School Bus Stopping Law to a designated administrator and/or their supervisor (or Childline or law enforcement, if a mandated reporter situation) as soon as possible.
	T1	d. Drug and alcohol testing for covered drivers and personnel in safety sensitive positions.
	T2	2. The school entity should develop and review annually policies/procedures related to:
	T1	a. Appropriate use of the Internet, including educating students on appropriate online behavior, social networking, and cyberbullying.
	T2	b. Maintaining professional adult/student boundaries.

Policy and Training Assessment Criteria

✓	Tier	Statement
	T1	3. The school entity should have a policy/procedure regarding the Student Code of Conduct in place that includes:
	T1	a. Clear behavioral expectations and consequences for violations, including sanctions for bomb threats, weapons, and drug offenses.
	T1	b. Ensuring it is readily available to students and parents.
	T2	c. Annual review by administration.
	T1	4. The school entity should have policies/procedures guiding the reporting and data analysis of school disciplinary incidents, including Safe Schools Report data.
	T2	5. The assessor should review data on the rates of student referrals to the following:
	T2	a. Police involvement, including arrests and citations issued.
	T2	b. Detention.
	T2	c. In-School Suspension.
	T2	d. Out-of-School Suspension.
	T2	e. Expulsions.
	T3	f. Change in the number of referrals over time.
School Security Personnel		
	T1	1. The school entity should have policies/procedures regarding school security personnel that are established by school administration and developed in coordination with the applicable law enforcement agencies as well as the school safety and security coordinator.
	T1	2. These policies/procedures should address the following:
	T1	a. Personnel, including job descriptions outlining responsibilities, duties, and training requirements.
	T2	b. Weapons.
	T1	c. Use of force.
	T1	d. Interview/interrogation.
	T1	e. Use of restraints.
	T1	f. Conducting random unannounced searches to identify weapons, drugs, and other contraband throughout the school year.

STATUTORY TRAINING REGARDING SCHOOL SAFETY AND SECURITY

There are numerous trainings that are mandated by law. **School entities should be prepared to provide documentation of compliance with all mandated trainings to assessors.** At a minimum, each of the following statutory requirements should be reviewed by the assessor and evaluated:

Mandated Trainings		
✓	Tier	Statement
	T1	1. In accordance with Section 1310-B of the PA School Code, school employees have completed a minimum of 3 hours of training every 5 years in one or more of the following areas, based on the needs of the school entity: (check all that apply):
	T1	a. Situational awareness.
	T1	b. Trauma-informed approaches.
	T1	c. Behavioral health awareness.
	T1	d. Suicide and bullying awareness.
	T1	e. Substance use awareness.
	T1	f. Emergency training drills, including fire, natural disaster, active shooter, hostage situation and bomb threat.
	T1	g. Identification or recognition of student behavior that may indicate a threat to the safety of the student, other students, school employees, school facilities, the community or others.
	T1	2. School employees having direct contact with children have completed a minimum of 3 hours of training every 5 years on child abuse recognition and reporting in accordance with Section 1205.6 of the PA School Code, including:
	T1	a. Recognition of the signs of abuse and sexual misconduct.
	T1	b. Mandatory reporting requirements for suspected abuse and sexual misconduct.
	T1	c. The school entity’s policies/procedures related to reporting of suspected abuse and sexual misconduct.
	T1	d. Maintenance of professional, appropriate relationships with students.
	T1	3. The school entity provides at least 4 hours of training in youth suicide awareness and prevention every 5 years for professional educators in buildings serving students in grades 6-12, in accordance with Section 1526 of the PA School Code.
	T1	4. Per Section 1205.4 of the PA School Code, the school entity offers a cardiopulmonary resuscitation training (CPR) class on school premises at least once every 3 years to all employees.
	T1	a. The training was conducted by employees of or an individual certified by the American Red Cross, the American Heart Association, or other certifying agency approved by the Department of Health.
	T1	b. The documented completion of training, including testing of skills and knowledge, signed by the trainer with their title and date, is retained in the participating employee’s files.

Policy and Training Assessment Criteria

✓	Tier	Statement
	T1	c. The school entity ensures that each school location has at least one person certified in CPR during regular school hours when school is in session and students are present, in accordance with Section 1424 of the PA School Code.
	T1	5. In accordance with Section 1302-E of the PA School Code, the chief school administrator or a designee, after consultation with the school entity's safety and security coordinator, has facilitated opportunities for members of the threat assessment team to complete training that is consistent with nationally recognized best practices.
	T1	6. Threat assessment team members have completed training that addresses the following, as required by Section 1302-E :
	T1	a. The responsibilities of team members.
	T1	b. The process of identifying, reporting, assessing, responding to and intervening with threats, including identifying and avoiding racial, cultural or disability bias.
	T1	c. Confidentiality requirements under Federal and State law.
	T1	7. Educational awareness regarding threat assessment has been provided for school employees who are not members of the threat assessment team, in accordance with Section 1302-E(a) .
	T1	8. Threat assessment awareness education, including the existence and purpose of the threat assessment team, has been provided for all students, parents and guardians.
	T1	9. As required in Section 328(1) of the PA School Code, new school directors completed 5 hours of training within their first year, including instruction and academic programs with 1 hour on best practices related to trauma-informed approaches; personnel; fiscal management; operations; governance; and ethics and open meetings.
	T1	10. Re-elected/re-appointed school directors completed 3 hours of advanced training within one year of their renewed term, including information on relevant changes to Federal and State public school law and regulations, fiscal management, trauma-informed approaches and other information deemed appropriate by PDE, per Section 328(2) of the PA School Code.
	T1	11. All school security personnel successfully completed the Basic School Resource Officer Course offered by NASRO or equivalent training prior to starting with the school, in accordance with Article XIII-C of the PA School Code.
	T1	12. All school security personnel successfully completed annual training as required by Article XIII-C of the PA School Code.
Mandated School Drills		
	T1	1. In accordance with Section 1517(a.1)(2) of the PA School Code, the chief school administrator or a designee oversees the instruction and training of students and school employees in school security drill procedures.
	T1	2. School building chief administrators ensure that their teachers conduct fire drills, per Section 1517(a) of the PA School Code.

Note: Section 1302-E Threat Assessment Teams shall apply beginning in the 2021-2022 school year.

Policy and Training Assessment Criteria

✓	Tier	Statement
	T1	3. The school entity conducts at least one school security drill in each school building as required by Section 1517 (a.1) of the PA School Code.
	T1	a. A school security drill was performed within the first 90 days of the school year.
	T1	4. Two emergency school bus evacuation drills are conducted each year.
	T1	a. School bus evacuation drills include the practice and instruction concerning the location, use and operation of emergency exit doors and fire extinguishers and the proper evacuation of buses in the event of fires or accidents, per Section 1517 (d) of the PA School Code.
	T1	b. Bus operators are also provided with proper training and instructions.
	T1	5. Teachers in all grades of the school entity have received instruction resources regarding the dangers of fire and prevention of fire waste, per Section 1518 of the PA School Code.
	T1	a. Students receive instruction and training, both written and through monthly drills during the school year, on how to leave the school buildings in the shortest possible time without confusion or panic in the event of a sudden emergency.
	T1	6. The school entity conducts a disaster response or emergency preparedness plan drill, which may include a natural disaster drill, at least annually, in accordance with 35 Pa. C.S.A. 7701 .

School safety and security assessments should include recommendations regarding existing trainings that will help a school entity prioritize needs and make decisions about how to improve the safety and security of their school.

CRITERIA-BASED TRAINING RELATING TO SCHOOL SAFETY AND SECURITY

While the training below is not mandated by law, it is imperative that students, employees and first responders are trained in certain areas as it relates to school safety. The following are best practices regarding the level of training necessary to increase school safety and security. With respect to the training of employees and students, consideration should always be given for the inclusion of local law enforcement and first responders who are qualified to participate in training.

Note: Some training and professional development specific to Physical Criteria and Student Assistance, Behavior Health & School Climate Criteria are included in those sections.

TRAINING FOR ALL SCHOOL EMPLOYEES AND STUDENTS

Best Practices		
✓	Tier	Statement
	T1	1. Everyone should be regularly and repetitively trained NOT to open exterior doors for anyone, and to direct any unknown persons to the school building's main office.

Policy and Training Assessment Criteria

✓	Tier	Statement
	T1	2. Everyone should be regularly and repetitively trained NOT to PROP exterior doors open at any time.
	T1	3. Everyone should be trained to immediately report doors that are not closing or locking correctly.
	T1	4. Everyone should be trained and periodically refreshed on how to identify and report safety concerns (e.g., <i>Safe2Say Something</i> , online portal, texting, telephone, box for written notes, in person meetings, etc.).
Additional Employees Training		
✓	Tier	Statement
	T1	1. All school entity employees should be trained regarding the Security and Emergency Preparedness/All Hazards Plan.
	T1	a. Training should be conducted at initial employment.
	T1	b. Training refreshers should occur at the beginning of each school year.
	T1	c. Training refreshers should recur throughout the school year.
	T1	2. Key staff should be trained on shutdown procedures for critical building systems in the event of an emergency.
	T1	a. A critical building systems shutdown quick reference guide should be made available to key staff, alternative personnel, and first responders.
	T1	3. If the school entity's Emergency Preparedness/All-Hazards Plan calls for assigning classroom teachers to Incident Command System positions, school entities should establish and train their employees on the "Buddy System," as recommended by PEMA in the "All-Hazards Toolkit".
	T1	4. School entity employees should be trained on when and how to make a school wide emergency announcement, if necessary.
	T1	5. School entity employees should be trained on the appropriate use of fire alarms.
	T1	6. Employees should be trained in reverse evacuation drills from playgrounds and athletic areas in the event of an external threat.
	T1	7. All school entity employees who work directly with student information should be trained in appropriate handling of student information and student records in accordance with law and policy/procedure.
	T1	a. The training should include how to balance potential safety concerns with student privacy.
	T1	8. School employees and students should receive regular instruction on cyber threats facing schools.
	T2	9. Bleeding control training should be offered to all employees through "Stop the Bleed" or a similar program.

Additional Student Training		
NOTE: Student training should be basic and general, as sharing specific actions and plans would jeopardize the operation security of emergency plans and could result in unintended consequences. Furthermore, student training must be tailored to their age and developmental level.		
✓	Tier	Statement
	T1	1. Students should receive age-appropriate education awareness regarding the Safe2Say Something or similar reporting program, including how to report, what to report, and overcoming potential barriers to reporting.
	T1	2. Students should receive age-appropriate education awareness regarding fire and school safety drills and practice what they are to do.
	T1	a. Drills should include reverse evacuation from playgrounds and athletic areas in the event of an external threat.
	T2	b. School entities should utilize a trauma-informed approach in debriefing students after a drill.